

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

In Re:

SAEED FRANKLIN  
DON-JILL H FRANKLIN

Debtors

Chapter 13  
Bankruptcy No.24-13247-AMC

OBJECTION OF CHAPTER 13 TRUSTEE  
TO CONFIRMATION OF PLAN OF DEBTORS

**AND NOW** comes Kenneth E. West, Esq., Standing Chapter 13 Trustee, to object to confirmation of the chapter 13 plan of the Debtors, because it fails to comply with 11 U.S.C. Sections 1322 and/or 1325 of the Bankruptcy Code, and/or Debtors have failed to provide information, evidence, or corrections to the petition, schedules, statements, or other documents filed by Debtors to enable the standing trustee to evaluate the Plan for confirmation, as follows:

The Plan is underfunded in that the total filed proofs of claim which are to be paid through the Plan exceed the value of the Plan.

**WHEREFORE**, the standing trustee requests that the Court enter an order in the form annexed hereto denying confirmation of the Plan.

Respectfully submitted,

*/s/ Kenneth E. West*

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Kenneth E. West, Esquire  
Chapter 13 Standing Trustee